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*Attorneys for Defendants:*  
*AMY PINTO LOME REVOCABLE TRUST,*  
*U/A/D 5/22/03; AMY PINTO LOME,*  
*individually and in her capacity as Grantor*  
*and Trustee for the Amy Pinto Lome Revocable*  
*Trust u/a/d 5/22/03; and LEONARD D. LOME,*  
*in his capacity as Trustee for the Amy Pinto*  
*Lome Revocable Trust u/a/d 5/22/03*

**IN THE UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION  
CORPORATION,

Adv. Pro. No.08-01789 (SMB)

Plaintiff-Appellant,

SIPA LIQUIDATION

v.

(Substantially Consolidated)

BERNARD L. MADOFF INVESTMENT  
SECURITIES LLC,

Defendant.

In Re:

BERNARD L MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation of  
Bernard L. Madoff Investment Securities LLC,

Plaintiff,

v.

AMY PINTO LOME REVOCABLE TRUST,  
U/A/D 5/22/03; AMY PINTO LOME,  
individually and in her capacity as Grantor  
and Trustee for the Amy Pinto Lome Revocable  
Trust u/a/d 5/22/03; and LEONARD D. LOME,  
in his capacity as Trustee for the Amy Pinto  
Lome Revocable Trust u/a/d 5/22/03,

Defendants.

Adv. Pro. No. 10-04588 (SMB)

**CERTIFICATE OF NO OBJECTION OF MOTION OF DEFENDANTS' COUNSEL  
ROBERT M. McCLAY AT THE LAW FIRM OF McCLAY•ALTON, P.L.L.P. AND  
DEFENDANTS' COUNSEL MARVIN C. INGBER FOR AN ORDER PURSUANT TO  
RULE 2090-1(e) OF THE LOCAL BANKRUPTCY RULES TO REMOVE BRUCE S.  
SCHAEFFER AS COUNSEL TO DEFENDANTS**

Defendants AMY PINTO LOME REVOCABLE TRUST, U/A/D 5/22/03; AMY PINTO  
LOME, individually and in her capacity as Grantor and Trustee for the Amy Pinto Lome  
Revocable Trust u/a/d 5/22/03; and LEONARD D. LOME, in his capacity as Trustee for the  
Amy Pinto Lome Revocable Trust u/a/d 5/22/03 ("Defendants"), by and through their  
undersigned counsel, Robert M. McClay, McClay•Alton, P.L.L.P. and Marvin C. Ingber  
("Active Counsel for Defendants") submit this certificate pursuant to the United States  
Bankruptcy Court, Southern District of New York, Local Bankruptcy Rule 9075-2, and  
respectfully represent:

1. On April 22, 2015, Active Counsel for Defendants filed the *Motion of  
Defendants' Counsel Robert M. McClay at the Law Firm of McCLAY•ALTON, P.L.L.P. and  
Defendants' Counsel Marvin C. Ingber for an Order Pursuant to Rule 2090-1(e) of the Local*

*Bankruptcy Rules to Remove Bruce S. Schaeffer as Counsel to Defendants* (the “Motion”) (08-01789, ECF No. 9849; 10-04588, ECF No. 41).

2. The deadline for filing objections to the Motion expired on June 3, 2015 at 4:00 p.m. prevailing Eastern time. A hearing on the Motion has been scheduled for June 8, 2015 at 12:00 p.m. prevailing Eastern time.

3. Notice of the Motion was provided by U.S. Mail, postage prepaid or email to:

- a. Defendants Amy Pinto Lome & Leonard D. Lome;
- b. Bruce S. Schaeffer, Esq.;
- c. Trustee c/o Marc E. Hirschfield, Esq., Dean Hunt, Esq. and Farrell A. Hochmuth, Esq.;
- d. All parties included in the Master Service List as defined in the Order Establishing Notice Procedures and Limiting Notice dated November 5, 2011 (ECF No. 4560);
- e. All parties that have filed a notice of appearance in this case: Kevin H. Bell, Esq. with Securities Investor Protection Corporation.

4. Counsel has reviewed the Court’s docket not less than forty-eight (48) hours after expiration of the time to file an objection, and to date, no objection, responsive pleading, or request for a hearing with respect to the Motion appears thereon. Additionally, no party has indicated to the Active Counsel for Defendants that it intends to oppose the relief requested in the Motion.

5. An electronic copy of a proposed order (the “Order”), substantially in the form of the proposed order annexed to the Motion will be submitted to the Court, along with this Certificate.

6. Pursuant to United States Bankruptcy Court, Southern District of New York Local Bankruptcy Rule 9075-2, Active Counsel for Defendants respectfully request that the Order be entered without a hearing.

Dated: St. Paul Minnesota

June 5, 2015

By: /s/ Robert M. McClay  
Robert M. McClay #69620  
McClay•Alton, P.L.L.P.  
(Pro Hac Vice)  
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Dated: Edina, Minnesota

June 5, 2015

By: /s/ Marvin C. Ingber  
Marvin C. Ingber #0048859  
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